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9 Attorneys for Defendants  
Sikorsky Aircraft Corporation; Sikorsky Support  
10 Services, Inc. dba Sikorsky Aerospace Maintenance

11 UNITED STATES DISTRICT COURT  
12 CENTRAL DISTRICT OF CALIFORNIA  
13

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15 COLETTE CARPENTER, etc., et al.,

16 Plaintiffs,

17 vs.

18 SIKORSKY AIRCRAFT  
CORPORATION, et al.,

19 Defendants.  
20

Case No. 2:14-cv-07793-JAK (AJWx)

**DISCOVERY MATTER**

**STIPULATION FOR PROTECTIVE  
ORDER**

Judge: Hon. John A. Kronstadt  
Magistrate: Hon. Andrew J. Wistrich

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22 WHEREAS, discovery in this action will likely involve production and  
23 disclosure of certain documents and information pertaining to the parties'  
24 commercially sensitive or private information, which require protection from public  
25 disclosure;

26 WHEREAS the parties desire to litigate this action without jeopardizing their  
27 commercially sensitive or private information, or the commercially sensitive or  
28 private information of any third party;

[Proposed]  
Stipulated Protective Order

1 WHEREAS, the parties met and conferred regarding the terms of a proposed  
2 protective order;

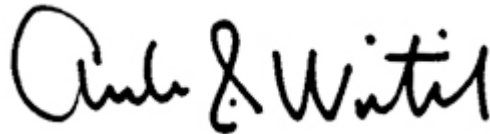
3 WHEREAS, Exhibit A is a Modified Standing Protective Order For Cases  
4 Assigned To Judge John A. Kronstadt;

5 WHEREAS, the parties stipulate, and propose to adopt Exhibit A as the  
6 operative protective order in this matter;

7 WHEREAS, the parties attach Exhibit B, a redline version reflecting  
8 proposed modifications to Judge Kronstadt's Standing Protective Order;

9 IT IS THEREFORE AGREED, STIPULATED, AND REQUESTED by and  
10 among the parties, through their respective attorneys of record, that for good cause  
11 shown, Exhibit A as the operative protective order governing this matter.

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13 IT IS SO ORDERED this 22<sup>nd</sup> day of January, 2015.

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16  
17 The Honorable Andrew J. Wistrich  
18 United States Magistrate Judge

19 Respectfully Submitted,

20  
21 Dated: January 20, 2015

22 James W. Hunt  
23 Mark R. Irvine  
24 FITZPATRICK & HUNT, TUCKER, COLLIER,  
25 PAGANO, AUBERT, LLP

26 By: /s/ Mark R. Irvine

27 Mark R. Irvine  
28 **Attorneys for Defendants Sikorsky  
Aircraft Corporation; Sikorsky  
Support Services, Inc. dba Sikorsky  
Aerospace Maintenance**

[Proposed]  
Stipulated Protective Order

1  
2 Dated: January 20, 2015

Ronald L.M. Goldman  
Timothy A. Loranger  
Baum Hedlund Aristei & Goldman, P.C.

3  
4  
5 By: /s/ Timothy A. Loranger

6 Timothy A. Loranger  
7 **Counsel for Plaintiffs**

8 Dated: January 20, 2015

9 Patrick J. Kearns  
10 William J. Katt  
11 Wilson Elser Moskowitz Edelman  
& Dicker LLP

12 By: /s/ Patrick J. Kearns

13 Patrick J. Kearns  
14 **Counsel for Defendant CUBIC**  
15 **DEFENSE APPLICATIONS**

16 Dated: January 20, 2015

17 Mack H. Schultz (admitted pro hac vice)  
18 Perkins Coie, LLP

19 By: /s/ Mack H. Schultz

20 Mack H. Schultz  
21 **Counsel for Defendants, BAE Systems,**  
22 **Inc.; BAE Systems Simula, Inc.; and**  
23 **BAE Systems Aerospace & Defense**  
24 **Group, Inc.**

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1 Dated: January 20, 2015

Steven E. Young  
Carol Chow  
Freeman, Freeman & Smiley, LLP

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4  
5 By: /s/ Steven E. Young  
Steven E. Young  
6 **Counsel for Defendant Prototype**  
7 **Engineering and Manufacturing, Inc.**  
8

9 Attestation:

10 Pursuant to L.R. 5-4.3.4(a)(2)(i), I attest that all signatories listed above concur in  
11 the filing's content and have authorized the filing.

12 FITZPATRICK & HUNT,  
13 TUCKER, COLLIER, PAGANO, AUBERT, LLP  
14

15 By: /s/ Mark R. Irvine  
16 Mark R. Irvine  
17 **Attorneys for Defendants Sikorsky**  
18 **Aircraft Corporation; Sikorsky**  
19 **Support Services, Inc. dba Sikorsky**  
20 **Aerospace Maintenance**  
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